

Ms. Margaret Green
Office of Municipal Assistance (3WP24)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

**Municipal Sanitary Authority of New Kensington
Retirement Notification**

Our Reference
408560

Two Allegheny Center
Nova Tower 2, Suite 1301
Pittsburgh PA 15212
United States of America

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www.mottmac.com/americas

July 16, 2019

Dear Ms. Green:

On behalf of the Municipal Sanitary Authority of the City of New Kensington (MSANK), this letter is advising you that MSANK's pretreatment coordinator, Joseph Ditty, will be retiring effective December 31, 2019.

I will be assuming Mr. Ditty's daily pretreatment responsibilities although all pretreatment permits, notices of violation, billing etc. will continue to be issued by MSANK.

This change in staffing will be noted in the Pretreatment Annual Report for 2019. If there are any other requirements that need to be addressed due to this change in personnel, please let me know.

If you have any questions regarding these matters, please contact me.

Linda French

Linda French
Project Scientist
T 412.497.2912
Linda.French@mottmac.com

//f

cc: Joe Ditty (MSANK)
Daniel H. Rowe (MSANK)
Larry Loperfido (Solicitor)
Chris Henry (Mott MacDonald)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Mr. Joseph Ditty
Pretreatment Coordinator
Municipal Sanitary Authority for the City of New Kensington
120 Logans Ferry Road
New Kensington, Pennsylvania 15068-2046

Re: Pretreatment Program
NPDES No. PA0027111

FEB 21 2017

Dear Mr. Ditty:

I have reviewed the Authority's response to Jasmine Hennie's comments on the sampling plan for reevaluation of its local limits, which was submitted on November 8, 2016.

We appreciate the clarification regarding the issues raised and your sampling plan is acceptable and able to commence immediately. As of this time, no draft permit for the Authority has been submitted. In the case that monitoring for additional pollutants is added, this will need to be addressed while re-evaluating your local limits. You have a year from the permit issuance date to submit your local limits.

If you have any questions regarding this matter, please contact me at 215-814-5736, or by e-mail at green.margaret@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Margaret Green".

Margaret Green
NPDES Permits and Enforcement (3WP41)
Water Protection Division

cc: Daniel H. Rowe, Jr., MSANK
Linda French, Mott MacDonald
Chris Kriley, PADEP Southwest Region
Sean Furjanic, PADEP Central Office





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NOV 14 2016

NPDES PERMITS BRANCH
(3WP41)

Ms. Jasmine Hennie
NPDES Permits Branch (3WP41)
Water Protection Division
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Municipal Sanitary Authority of the City of New Kensington
Industrial Pretreatment Program
Headworks Analysis Sampling Plan
Response to Review Letter

Our Reference
351383

Gateway View Plaza
1600 W. Carson Street
Pittsburgh PA 15219
United States of America

November 8, 2016

Dear Ms. Hennie:

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www.mottmac.com/americas

On behalf of the Municipal Sanitary Authority of the City of New Kensington (MSANK), the following responds to your letter dated October 11, 2016, regarding the MSANK Headworks Analysis Sampling Plan.

1. Pollutants of Concern

MSANK does not want to add Ammonia to the list of pollutants to be evaluated in its local limits reevaluation because there are no known industrial users that discharge Ammonia above background levels. As part of the most recent NPDES permit renewal application, the Ammonia-N concentration in the influent was measured at <0.05 mg/l. Of the three (3) samples of effluent, both the maximum and average Ammonia-N concentration in the effluent was <1.0 mg/l. Additionally, there have been no instances of ammonia toxicity associated with the effluent discharged from the MSANK treatment plant. The effluent did not exhibit toxicity, and each sample passed the four (4) Whole Effluent Toxicity Tests conducted for the permit renewal application. MSANK believes that these reasons justify not including Ammonia as a parameter to be evaluated during the headworks analysis.

2. Monitoring Points

Please note that MSANK allowed a recreational vehicle to discharge the sanitary wastewater from the vehicle several years ago. This was an isolated occurrence and hauled wastewater has not been accepted at the treatment plant since that time. As such, there is no basis for collecting data to determine hauled waste loadings as part

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of the re-evaluation. MSANK will remove the reference to hauled wastewater from the 2016 Pretreatment Annual Report.

3. Sampling

Grab samples will be collected for cyanide, hexavalent chromium and oil and grease applicable to the five (5) raw influent, five (5) final effluent samples and six (6) samples of background wastewater from domestic sources. MSANK will direct the sampler to collect a series of grab samples instead of a single sample to ensure that the results are more representative.

Please contact me if you have any questions regarding this matter.

Sincerely,



Linda French
Project Scientist
T 412.497.2912
Linda.French@mottmac.com
/lf

cc: Joseph Ditty - MSANK
Daniel Rowe - MSANK

Lovell, John

From: French, Linda D <Linda.French@mottmac.com>
Sent: Thursday, December 01, 2016 9:11 AM
To: Lovell, John
Subject: RE: permit fees

Categories: EZ Record - Shared

Thanks a lot John. Appreciate the prompt response.

From: Lovell, John [mailto:Lovell.John@epa.gov]
Sent: Thursday, December 01, 2016 9:09 AM
To: French, Linda D
Subject: RE: permit fees

We don't really consider the fees to be a part of the approved program (there is a requirement to fund the program, but we leave the how part to the discretion of the POTW), so there would be no need to submit the change as a program modification (it's definitely not a major modification). If the fees are part of the pretreatment ordinance, we would generally ask you to submit a copy after adoption, but that is more informational so that we have a copy of the current pretreatment ordinance. If it's a separate document that wasn't submitted previously, then there is no need to submit it.

Let me know if you'd like to discuss further.

John Lovell
Pretreatment Coordinator
USEPA Region 3
1650 Arch Street
Philadelphia, PA 19103-2029
215-814-5790
215-814-2301 (fax)

From: French, Linda D [mailto:Linda.French@mottmac.com]
Sent: Thursday, December 01, 2016 8:50 AM
To: Lovell, John <Lovell.John@epa.gov>
Subject: FW: permit fees

Hi John,

Since I now understand that Jasmine is no longer with EPA, could you please give me your thoughts on the e-mail I originally sent to her a few minutes ago?

Thanks.

From: French, Linda D
Sent: Thursday, December 01, 2016 8:44 AM
To: 'hennie.jasmine@epa.gov'
Subject: permit fees

Hi Jasmine,

The Municipal Sanitary Authority of the City of New Kensington has found it necessary to increase the permit fees next year for the industrial users of their sewer system. This is because of a decline in the number of permitted users and an increase in expenses over the past few years. I just wanted to check with you as to whether this would qualify as a major modification to

the pretreatment program and therefore trigger approval requirements, or whether they could just increase the permit fees based on their needs.

Can you please let me know if there are any EPA requirements if they increase the permit fees?

Thanks.

Linda French

Project Scientist

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Linda.French@mottmac.com



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

OCT 11 2016

Mr. Joseph Ditty
Pretreatment Coordinator
Municipal Sanitary Authority for the City of New Kensington
120 Logans Ferry Road
New Kensington, Pennsylvania 15068-2046

Re: Pretreatment Program
NPDES No. PA0027111

Dear Mr. Ditty:

I have reviewed the Authority's sampling plan for reevaluation of its local limits, which was submitted on June 21, 2016. Based on this review, I have the following comments.

Pollutants of Concern

The Authority did not include ammonia in its list of pollutants to be evaluated in its local limits reevaluation. Ammonia has often been found to cause toxicity in POTW effluents and therefore, ammonia should be included in the list of pollutants. Note that ammonia can be eliminated from the list of pollutants if there are no industrial users discharging ammonia above background levels. The Authority must provide justification if ammonia is eliminated from the list of pollutants.

Monitoring Points

Based on the Authority's annual pretreatment report for calendar year 2015, the Authority accepts hauled waste at its treatment plant. If the Authority accepts hauled waste that is not regulated through the local limits, the Authority will need to collect data to determine the hauled waste loadings for use in the evaluation.

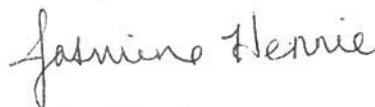
Sampling

The Authority's sampling plan states that five, 24-hour composite samples of the raw influent and final effluent and six, 24-hour composite samples of background wastewater from domestic sources will be collected for analysis. The Authority must collect grab samples for cyanide, hexavalent chromium, and oil and grease. Also, for grab samples, it is recommended that the Authority takes a series of grab samples instead of a single sample to ensure that the results are more representative of the Authority's system.



Please provide a response to the issues raised above. If you have any questions regarding this matter, please contact me at 215-814-5793, or by e-mail at hennie.jasmine@epa.gov.

Sincerely,



Jasmine Hennie
NPDES Permits and Enforcement (3WP41)
Water Protection Division

cc: Daniel H. Rowe, Jr., MSANK
Linda French, Mott MacDonald
Chris Kriley, PADEP Southwest Region
Sean Furjanic, PADEP Central Office



THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

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JUN 23 2016
NPDES PERMITS BRANCH
(3WP41)

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

June 21, 2016

Ms. Jasmine Hennie
Office of Municipal Assistance (3WP24)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON
NPDES PERMIT NO. PA0027111
HEADWORKS ANALYSIS SAMPLING PLAN

Dear Ms. Hennie:


On behalf of the Municipal Sanitary Authority of the City of New Kensington (MSANK), please find enclosed the proposed Headworks Analysis Sampling Plan being submitted for your review and approval.

The NPDES permit applicable to MSANK expired on June 30, 2015. A renewal application was submitted in December 2014. Although the PA Department of Environmental Protection has not yet issued a renewal NPDES permit, MSANK desires to submit the Headworks Analysis sampling plan for approval at this time in order to avoid any delay in conducting the Headworks Analysis once the permit issued.

It should be noted that there have been no significant changes in the number or type of industrial discharges to the MSANK treatment plant or to the influent, effluent and sludge quality since the previous headworks analysis was conducted in 2012. Based on these considerations, MSANK desires to conduct the required Headworks Analysis in the most cost effective manner possible.

Thank you for your consideration of this matter.

THE MUNICIPAL SANITARY AUTHORITY OF THE
CITY OF NEW KENSINGTON



Daniel H. Rowe, Jr.
Manager

Enclosure

Cc: David Ponchione, P.E. (PADEP)
Joseph Ditty
Linda French (HMM)

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HEADWORKS ANALYSIS SAMPLING PLAN

A. Pollutants to be Evaluated

MSANK proposes to evaluate a total of eighteen parameters as part of the Headworks Analysis. The Headworks Analysis evaluation will consist of the “standard ten” parameters including Arsenic, Cadmium, Chromium, Copper, Cyanide, Lead, Mercury, Nickel, Silver and Zinc. Molybdenum and Selenium will also be evaluated due to their inclusion in EPA’s and Pennsylvania sludge quality program. MSANK also has local limitations for Carbonaceous Biochemical Oxygen Demand, Total Suspended Solids, Hexavalent Chromium, Oil and Grease, Temperature and pH. No additional toxic pollutants are listed in the NPDES permit, nor have other priority pollutants been detected at significant levels during the priority pollutant scans conducted during the quarterly monitoring required by the Pretreatment Program.

B. Sampling Points

MSANK proposes the use of five sampling locations to conduct the Headworks Analysis. The proposed sampling locations are:

1. Raw Influent – the raw influent samples will be collected prior to the influent combining with any recycle or other internal waste streams.
2. Influent to Digester
3. Final Effluent
4. Background samples solely from domestic sources - MSANK applies the local limitations to commercial as well as industrial facilities within the service area. The Municipal Water Authority of the City of New Kensington is the sole supplier of potable water within the MSANK service area. MSANK proposes to collect background samples from sewer segments located in residential sections of Lower Burrell, the City of Arnold and the City of New Kensington. The background samples will be collected on the same days that the Influent and Effluent samples are collected.
5. Sludge

C. Number and Type of Sampling Events

1. Historical Sample Data

MSANK proposes to use historical monitoring data from years 2012 to 2016 to supplement the samples to be collected for the Headworks Analysis.

2. Proposed Sample Data

In order to assess current plant conditions, MSANK proposes to supplement the referenced historical data by conducting sampling on a daily basis for a five-day period. Grab samples will be collected for Cyanide, Hexavalent Chromium, and

Oil and Grease. Temperature and pH will be evaluated through on-site testing procedures. All other parameters will be evaluated using 24-hour composite samples. Proposed sample data includes the following:

a. Raw Influent and Final Effluent

Five, 24-hour composite samples of the Raw Influent and Final Effluent will be collected for analysis. These samples will be analyzed for the eighteen parameters referenced previously.

b. Influent to Digester

A total of five daily grab samples of Influent to Digester will be collected and analyzed for the non-conservative parameter of Cyanide. The samples will be collected on days when Influent and Effluent samples are being collected.

c. Background

Six, 24-hour composite samples of Background wastewater from domestic sources will be analyzed for the eighteen parameters referenced previously. Two samples will be collected from a background sampling location in New Kensington, two samples will be collected from a sampling location in Arnold and two samples will be collected from a sampling location in Lower Burrell.

d. Sludge

Five samples of sludge will be collected from the belt filter press area at the treatment plant. In order to obtain a representative sample, grab samples of sludge will be collected and then combined to form a single composite sample of sludge that will be analyzed for the eighteen parameters referenced previously. One composite sample of sludge will be collected per day, over a five-day period. Sludge samples will be collected on days when Influent and Effluent samples are being collected.

D. Analytical Methods/Detection Levels

MSANK proposes to conduct all pollutant analyses using EPA methodology with the most sensitive detection levels available for each method. A listing of the parameters and the proposed analytical methods are as follow:

Parameter	Analytical Method	Parameter	Analytical Method
Arsenic	EPA 200.8	Total Suspended Solids	SM 2540D
Cadmium	EPA 200.8	Hexavalent Chromium	EPA 218.6
Chromium	EPA 200.8	Oil and Grease	EPA 1664A
Copper	EPA 200.8	pH	EPA 150.1
Cyanide	SM4500CNE-99	Lead	EPA 200.8

Parameter	Analytical Method	Parameter	Analytical Method
Mercury	SM18 3112B	Temperature	SM 2550B
Nickel	EPA 200.8	Carbonaceous Biochemical	
Silver	EPA 200.8	Oxygen Demand	SM 5210-B
Zinc	EPA 200.8		
Molybdenum	EPA 200.8		
Selenium	EPA 200.8		

E. Schedule

MSANK proposes to conduct the required headworks analysis under the following schedule:

Sample Collection	September 2016
Evaluation of Sample Collection Data	October 2016
Headwork Analysis / Local Limits Reevaluation	November 2016
Submission of Local Limits Reevaluation to EPA	January 2017



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

FEB 21 2014

Mr. Joseph Ditty
Pretreatment Coordinator
Municipal Sanitary Authority of the City of New Kensington
120 Logans Ferry Road
New Kensington, PA 15068-9813

Re: Pretreatment Program
NPDES No. PA0027111
Public Notice Number PA-386-SGC

Dear Mr. Ditty:

I am pleased to approve modifications to the legal authority of the Municipal Sanitary Authority of the City of New Kensington pretreatment program in accordance with the General Pretreatment Regulations (40 C.F.R. 403). The intention to approve this modification was announced to the public on January 15, 2014, and no comments were received. A listing of the documents included in this approval is enclosed.

The U. S. Environmental Protection Agency's General Pretreatment Regulations describe the local pretreatment responsibilities based on the Clean Water Act. The pretreatment program that New Kensington implements must be consistent with these regulations and your approved program.

If this Agency can be of any assistance to you in administering this program, please contact Stephen Copeland at 215-814-5792.

Sincerely,

A handwritten signature in black ink, appearing to read "D.B. McGugan", is written over the typed name.

David B. McGugan, Ph.D.
Associate Director
Office of NPDES Permits and Enforcement
Water Protection Division

Enclosure

cc: Samuel Harper, PADEP, Southwest Region (w/enclosure)
Ron Furlan, PADEP Central Office (w/out enclosure)

**Documents Included in Pretreatment Program Modification Approval
Public Notice Number PA-386-SGC**

Local Limits

- **October 4, 2012 – Request for approval of revised local limits submitted by Linda French, Hatch Mott MacDonald, consultant for New Kensington**
- **December 12, 2012 – Letter from Stephen Copeland, U.S. EPA-Region 3, reviewing the initial submittal**
- **January 14, 2013 – Re-submittal of local limits by Linda French, Hatch Mott MacDonald, consultant for New Kensington, making the recommended changes**
- **January 31, 2013 – EPA acceptance of local limits**

Legal Authority

- **August 16, 1985 - Original Program Approval**
- **August 20, 2008 – Streamlining Revisions approved**
- **April 15, 2013 – Municipal Authority adoption of revised local limits**
- **December 9, 2013 – Submittal of Solicitor's Statement indicating that the Authority is covered by the PA Municipal Authorities Act**

